

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

**COLLIER LAND & COAL
DEVELOPMENT, LP,**

Debtor.

**COLLIER LAND & COAL
DEVELOPMENT, LP,**

Movant,

vs.

NO RESPONDENT.

Bankruptcy No. 10-22059-JKF

Chapter 11

Document No.

Related to Doc. No. 150

**MOTION FOR ADDITIONAL ENLARGEMENT OF TIME TO FILE DISCLOSURE
STATEMENT AND PLAN OF REORGANIZATION**

AND NOW comes Collier Land & Coal Development, LP, by and through its Counsel, Robert O Lampl, John P. Lacher and Elsie R. Lampl and files the following **MOTION FOR ADDITIONAL ENLARGEMENT OF TIME TO FILE DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION** as follows:

1. The Movant is Collier Land and Coal Development, L.P., the Debtor in the instant Chapter 11 Case which was commenced on March 25, 2010.
2. On January 31, 2011, this Honorable Court entered an Order which enlarged the time in which the Debtor could file its Disclosure Statement and Plan of Reorganization until April 25, 2011. The Court's Order was entered herein at Doc. No. 150.
3. The Debtor requires, and respectfully requests, an additional enlargement of time in the amount of sixty (60) days, until June 24, 2011. The basis of

the enlargement is that the Debtor is currently involved in discussions with potential investors and purchasers which, if said discussions come to fruition, would form the basis of its Plan. Any Plan filed at present, before the completion of the aforementioned discussions, would be speculative.

4. Although there has been prior enlargements of the time in which Debtor is to file its Disclosure Statement and Plan, no prejudice will result if the additional enlargement being requested is granted.

5. Debtor has recently obtained new counsel and has made significant progress in the case in the past few months including a substantial sale of some of its assets. Further, Debtor has initiated interest in potential purchasers and investors recently which have greatly increased the prospect of its reorganization.

WHEREFORE, it is respectfully requested that this Honorable Court enter an Order enlarging the time in which the Debtor may file its Disclosure Statement and Plan by a period of sixty (60) days, until June 24, 2011.

Respectfully Submitted,

/s/ Robert O Lampl
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CERTIFICATE OF SERVICE

Robert O Lampl, John P. Lacher and Elsie R. Lampl, hereby certify, that on the 25th day of April, 2011, a true and correct copy of the foregoing **MOTION FOR ADDITIONAL ENLARGEMENT OF TIME TO FILE DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION** was served upon the following (*via electronic service*):

Office of the U.S. Trustee
970 Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222

Michael Shiner
Tucker Arensberg, PC
One PPG Place, Suite 1500
Pittsburgh, PA 15222

/s/ Robert O Lampl
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